

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

April 16, 2021

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Pursuant to this Court's Orders (ECF Nos. 6681, 6714), counsel for Plaintiffs and for Al Rajhi Bank have met and conferred regarding a proposed schedule for jurisdictional discovery.

Although the parties disagree on the amount of time needed to complete jurisdictional discovery, in the spirit of compromise, both sides have agreed to a Friday, December 17, 2021 deadline for the completion of all jurisdictional fact discovery. This agreement is on the condition and with the understanding that the Parties will use their best efforts to move expeditiously through jurisdictional discovery and to complete all jurisdictional fact discovery as of that date.

Any interrogatories and requests for admissions must be served at least 30 days prior to the deadline for completing jurisdictional fact discovery.

The Parties also have agreed to address whether expert reports and related expert discovery are necessary or appropriate after document production and before the close of jurisdictional fact discovery.

Honorable Sarah Netburn

April 16, 2021

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Respectfully submitted,

COZEN O'CONNOR

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cc: The Honorable George B. Daniels (via ECF)  
All MDL Counsel of Record (via ECF)

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